

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2015-53-E**

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	)	
In re: Application of Duke Energy	)	
Progress, Inc. To Establish a	)	<b>PETITION TO INTERVENE</b>
Distributed Energy Resource	)	
Program	)	
	)	
	)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. The Commission opened this proceeding on the Application of Duke Energy Progress, Inc. to Establish a Distributed Energy Resource Program (“the Application”). The Application was filed with the Commission on February 9, 2015.
2. This Petition to Intervene is timely filed, as the Commission has established an intervention deadline of April 17, 2015 for this proceeding.
3. Duke Energy Progress, Inc. filed its Application pursuant to Section 58-39-130 of the Distributed Energy Resources Program Act (“the Act”). This section of the Act allows South Carolina electrical utilities to “apply to the Public Service Commission for approval to participate in the distributed energy resources

program” and sets forth specific requirements for participation. Section 58-39-130 further authorizes the Commission to approve, after a hearing, “such application if the applicant demonstrates that the program will further the goals of this chapter as set forth in Section 58-39-110,” which are “to promote the establishment of a reliable, efficient, and diversified portfolio of distributed energy resources for the State.” S.C. Code Sections 58-39-110, 130.

4. The Act requires a hearing on the utilities’ applications to participate in the distributed energy resources program and allows the “Office of Regulatory Staff, an electrical utility, or any other interested party [to] file a petition for amendment of a distributed energy resource program at any time.” S.C. Code Sections 58-39-130(A), (A)(3).

5. The Act further allows electrical utilities including Duke Energy Progress, Inc. to recover certain reasonable and prudent costs incurred to implement an approved distributed energy resource program. S.C. Code Section 58-39-140. Recoverable costs are capped in Section 58-39-150 “[f]or the protection of consumers and to ensure that the cost of DER programs do not exceed a reasonable threshold.”

6. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who receive electricity service from Duke Energy Progress, Inc. and will be impacted by

the decisions made in this proceeding regarding the distributed energy resource program and cost recovery for the program. The address of CCL's main office is 328 East Bay Street, Charleston, SC 29402.

7. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from Duke Energy Progress, Inc. and will be impacted by the decisions made in this proceeding regarding the distributed energy resource program and cost recovery for the program. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.

8. The Conservation Groups and their members have direct and substantial interests in the distributed energy resource decisions to be made by the Commission in this proceeding, and their interests cannot be adequately addressed by any other party. The Conservation Groups' position in this proceeding is to advocate for policies and incentives that will best support development of an effective and diversified portfolio of distributed energy resources and lead to cleaner, safer, and healthier communities for all South Carolinians. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this

proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

9. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 17th day of April, 2014.

/s/ J. Blanding Holman, IV  
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*Attorney for Petitioners South Carolina  
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## CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail with a copy of the Petition to Intervene of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 17th day of April, 2014.

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